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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12
13 KAREN SHIELDS,
14 Plaintiff,

15 vs.

16 CREDIT ONE BANK, N.A.; CREDIT ONE
17 FINANCIAL, a Nevada Corporation;
18 SHERMAN FINANCIAL GROUP, LLC, a
Delaware Limited Liability Company,

19 Defendants.

20
21 CASE NO.: 2:19-cv-00934-JAD-NJK

22
23 **STIPULATION AND ORDER TO STAY
DISCOVERY AND DISCOVERY
DEADLINES**

24 *(Third Request)*

25 Pursuant to LR IA 6-1, LR IA 6-2, and LR 26-4, Defendant Credit One Bank, N.A.
26 (“Defendant”) and Plaintiff Karen Shields (“Plaintiff”), by and through their undersigned counsel,
hereby submit this joint request to stay discovery. This is the parties’ first request to stay discovery
and their third request for a possible extension of the discovery deadlines which are set forth in
Stipulation and Order for Extension of Discovery Deadlines (ECF No. 42). The current discovery
deadline is February 12, 2020. (ECF No. 42.)

27 Good cause exists to stay discovery in this matter. The Court issued a Report and
28 Recommendation (ECF No. 43) on January 10, 2020 recommending that Defendant’s Motion to

1 Dismiss Plaintiff's First Amended Complaint be granted, without leave to amend by Plaintiff.

2 Therefore, to avoid any additional, unnecessary expenses, the parties respectfully request a
3 stay of the current discovery schedule (which is limited to the taking of six depositions). This stay
4 will lift only if: (1) an objection to the Court's Report and Recommendation is filed and the Court
5 thereafter were to not follow the said Report and Recommendation; or (2) if the Court does follow
6 the Report and Recommendation and an appeal of the Order therein is filed and granted by the
7 appellate court.

8 If the Court issues an Order contrary to the Report and Recommendation denying
9 Defendant's Motion to Dismiss, the parties agree to complete the six currently-scheduled limited
10 depositions of Plaintiff, Plaintiff's physician, and Defendant's four employees within 45 days of
11 such an Order. In conformance with the Court's previous Orders, no additional discovery, aside
12 from these six depositions, will occur.

13 DATED this 13th day of January, 2020.

14 LAW OFFICES OF MICHAEL P. BALABAN

13 DATED this 13th day of January, 2020.

14 OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
15 P.C.

16 */s/ Michael P. Balaban*

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26 **ORDER**

27 IT IS SO ORDERED.

28 
29 UNITED STATES MAGISTRATE JUDGE

30 January 14, 2020

31 DATE